

August 28, 2024

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The Honorable Denise L. Cote  
U.S. District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

**Re: Leave to File Amicus Submission in *Hamilton Reserve Bank Ltd. v. The Democratic Socialist Republic of Sri Lanka*, No. 22-cv-5199 (DLC)**

Dear Judge Cote:

We write on behalf of members of the Steering Committee of the ad hoc group of international bondholders of the Republic of Sri Lanka (“Sri Lanka”) (the “Steering Committee”), which includes some of the world’s largest financial institutions.<sup>1</sup> The Steering Committee respectfully requests leave to file a short (3-page) amicus brief in connection with Sri Lanka’s July 30, 2024 Motion for a Further Stay of Proceedings, ECF No. 106 (the “Stay Motion”).

The Steering Committee has been working with Sri Lanka on restructuring Sri Lanka’s external debt over an extended period of time. In the briefing on Sri Lanka’s most recent Stay Motion, both plaintiff Hamilton Reserve Bank and defendant Sri Lanka made statements and characterizations about the status of negotiations between Sri Lanka and the Steering Committee, some of which contradict each other. *See, e.g.*, Def.’s Mem. Supp. Stay Mot. at 10-11, 13, ECF No. 108 (describing negotiations resulting in Joint Working Framework with ad hoc bondholder group and characterizing “this process” as nearing “a successful completion” but that “a bit more time is needed”); Pl.’s Mem. Opp’n Def.’s Third Mot. for Stay at 1, 4-5, ECF No. 113 (describing “Sri Lanka’s negotiations with private creditors” as “effectively complete”); Def.’s Reply Mem. Supp. Stay Mot. at 3-4, ECF No. 114 (Sri Lanka asserting that—contrary to Plaintiff’s statements—“negotiations with private creditors” are not “effectively complete”).

Like other non-parties involved in these complex and multi-faceted negotiations, the Steering Committee respectfully requests the opportunity to add its perspective as the Court considers Sri Lanka’s requested stay. *See* Paris Club’s Letter Req. Leave to File Br. as Amicus Curiae, ECF No. 69; Paris Club’s Letter Supp. Sri Lanka’s Mot. for Further Stay, ECF No. 90; Berringer Decl. Supp. Stay Mot. Ex. 3 (additional letter from Paris Club in Support of Sri Lanka’s request to extend

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<sup>1</sup> The members of the Steering Committee submitting this letter are the following institutions: Amundi (UK) Limited; Barings LLC; Grantham, Mayo, Van Otterloo & Co. LLC (GMO); HBK Master Fund L.P.; and T. Rowe Price Associates, Inc.

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the stay), ECF No. 115-3; *see also* Statements of Interest by the United States, ECF Nos. 73, 91. Accordingly, the Steering Committee respectfully requests the Court's leave to submit the short amicus submission appended to this letter.

Respectfully submitted,

*/s/ Brian Pfeiffer*

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cc: All counsel of record